

# EXHIBIT C

Lauri Valjakka (Pro Se)  
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Filed on behalf of Pro Se  
*LAURI VALJAKKA*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

Case No. 4:22-cv-01490-JST

**DECLARATION OF LAURI VALJAKKA  
(PRO SE)**

1 I, Lauri Valjakka, declare as follows:


- 2 1. I am the Plaintiff in this matter and appear pro se. I am the sole inventor and proprietor of U.S.  
3 Patent No. 8,645,167.
- 4 2. I did not receive any Enforcement Assets from AiPi Solutions or its affiliates. All transfers to  
5 CDN Licensing Finland Oy occurred prior to July 21, 2022. I was not a transferee under  
6 CUVTA.
- 7 3. The license agreement with CDN Licensing Finland Oy was cancelled on September 26, 2023,  
8 retroactive to November 5, 2021. I held no active license at the time of Defendant's PI motion or  
9 counterclaim.
- 10 4. I hold a 70% equity position in CDN Licensing Finland Oy. The remaining 30% is held by Matti  
11 Saraheimo and Onni Hietalahti. Defendant did not name or pursue these shareholders.
- 12 5. On August 26, 2025, the Supreme Court of Finland ordered the Helsinki District Court to reopen  
13 ownership proceedings concerning the '167 Patent.
- 14 6. The patent application underlying U.S. Patent No. 8,645,167 was abandoned by Suomen Biisi  
15 Oy on November 8, 2010. I filed a Petition to Revive on December 22, 2010, which was  
16 accepted by the USPTO on March 4, 2011. The assignment to my name was recorded on March  
17 7, 2011, and the patent was granted on July 23, 2013.
- 18 7. As of September 25, 2025, no entity has submitted any claim to ownership. Under standard  
19 USPTO practice, any such claim should have been raised within two years of revival. The  
20 absence of competing claims over nearly fifteen years confirms my uninterrupted ownership and  
21 supports my request for confirmation by the Helsinki District Court.
- 22 8. The Finnish Police Investigation Report documents a coordinated enforcement operation  
23 conducted in 2004. Jukka Ojanen was convicted in 2011. A certified translation of the core  
24 sections is attached. The full report spans 1,142 pages and remains available for review.
- 25 9. During the Court mediator's hearing on August 8, 2023, I disclosed the PIR and the conviction  
26 of Jukka Ojanen. Netflix's listed witnesses — Ojanen and Karesniemi — disappeared  
27 immediately thereafter. The transcript confirms this procedural moment and remains available  
28

1 upon request.

2 10. I have maintained consistent enforcement efforts across jurisdictions for over two decades.

3 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
4 and correct.

5 Dated: September 26, 2025

  
6 /s/ Lauri Valjakka  
7 Lauri Valjakka (pro se)

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Defendant.

Case No. 4:22-cv-01490-JST

**DECLARATION OF MATTI  
SARAHEIMO**

1 I, Matti Saraheimo, declare as follows:

- 2 1. I am a shareholder in CDN Licensing Finland Oy.
- 3
- 4 2. I hold a **22.5% equity position** in the company.
- 5
- 6 3. I have been involved with the patent case underlying U.S. Patent No. 8,645,167 since **2001**, as a
- 7 shareholder of **e-3 Solutions Oy**, the original filer of the European patent application submitted
- 8 on **August 2, 2001**.
- 9
- 10 4. Prior to the filing, I served as **Chairman of the Board** of e-3 Solutions Oy, and also acted as an
- 11 **investor and advisor**, contributing to the strategic and technical development of the invention.
- 12
- 13 5. I was a signatory to the cancellation agreement dated September 26, 2023, which retroactively
- 14 cancelled the license agreement effective November 5, 2021.
- 15
- 16 6. I confirm that no Enforcement Assets were transferred to Lauri Valjakka from CDN Licensing
- 17 Finland Oy.
- 18
- 19 7. I have not been named or contacted by Defendant Netflix in connection with this litigation.
- 20
- 21 8. I affirm that Lauri Valjakka acted with transparency and procedural integrity throughout the
- 22 cancellation process and has maintained consistent enforcement efforts.
- 23
- 24 9. **I support Plaintiff's Motion to Stay Proceedings and Dismiss the CUVTA Claim**, and
- 25 confirm that all shareholders were treated equally and informed throughout the process.
- 26
- 27
- 28

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: September 26, 2025



Matti Saraheimo

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LAURI VALJAKKA,

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NETFLIX, INC.,

Defendant.

Case No. 4:22-cv-01490-JST

**DECLARATION OF ONNI HIETALAHTI**

1 I, Onni Hietalahti, declare as follows:

- 2 1. I am the **Chairman of the Board** and the **sole procurist** of CDN Licensing Finland Oy.
- 3
- 4 2. I hold a **7.5% equity position** in the company.
- 5
- 6 3. I have acted as **Finnish counsel and legal advisor to Lauri Valjakka since 2009**, supporting
- 7 his enforcement efforts, corporate structuring, and cross-border filings related to the '167 Patent.
- 8
- 9 4. I was a signatory to the cancellation agreement dated September 26, 2023, which retroactively
- 10 cancelled the license agreement effective November 5, 2021.
- 11
- 12 5. I confirm that no Enforcement Assets were transferred to Lauri Valjakka from CDN Licensing
- 13 Finland Oy.
- 14
- 15 6. I have not been named or contacted by Defendant Netflix in connection with this litigation.
- 16
- 17 7. I affirm that Lauri Valjakka acted with transparency and procedural integrity throughout the
- 18 cancellation process and has maintained consistent enforcement efforts.
- 19
- 20 8. I support Plaintiff's request for dismissal of the CUVTA claim and confirm that all shareholders
- 21 were treated equally and informed throughout the process.
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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: September 26, 2025



Onni Hietalahti